

RECEIVED
SDNY PRO SE OFFICE
2024 MAY 16 PM 4:51

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Steven P. Bradbury,

24-cv-3848

plaintiff,

v.

City of Montpelier, VT,

and its police department,

defendants.

COMPLAINT AND JURY DEMAND

1. This is Steven Bradbury's Complaint for damages and injunctive relief for defendants' systematic denial of his Constitutional rights causing him to lose his job, his car, and destroy his family and reputation.

JURISDICTION

2. Federal question under 42 U.S.C. §1983 and 18 U.S.C. §1962(c) ("R.I.C.O").

VENUE

3. Proper in this Court, not in Vermont, under principles of ***forum non conveniens*** (plaintiff cannot get a fair trial in Vermont).

FACTS COMMON TO ALL COUNTS.

4. Plaintiff is an individual who has been harmed by systematic deprivation of his rights by defendants causing plaintiff to lose his car, his job, his freedom, and his girlfriend because of defendants' actions to oppress and abuse him *because* he appeared defenseless and easy pickings to the Montpelier police when they falsely arrested him in 2020.

Case 2:24-cv-00599-gwc Document 1 Filed 05/15/24 Page 2 of 7

5. Mr Bradbury was arrested by Montpelier police near the Cumberland Farms after gassing up his car on his way to work in Barre Vermont.
6. Montpelier police illegally searched his car and then sought a warrant to cover up their illegal search.
7. The car was impounded. Mr Bradbury never got it back. Ever.
8. Later Mr Bradbury was arrested for allegedly stealing a laptop which he had borrowed. He languished in jail for nearly four months before finally pleading guilty for a sentence of time served *NOT* because he was guilty but in order to bring the matter to a conclusion and for no other reason.

COUNT ONE—42 U.S.C. §1983

9. Paragraphs one through eight are incorporated by reference.
10. Defendants' actions were state action depriving plaintiff of his Constitutional rights proximately causing damages in an amount to be proven at trial.

COUNT TWO (RICO)

11. Paragraphs one through ten are incorporated by reference.
12. Defendants' conduct of an enterprise through a pattern of racketeering caused Mr Bradbury damage to his business or property in an amount to be proven at trial.

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT

1. GRANTING INJUNCTIVE RELIEF both preliminary and permanent ORDERING defendants to cease abuse of his constitutional rights;
2. AWARDING damages in an amount to be proven at trial, trebled, plus attorney fees, interest, and costs;
- and
3. GRANTING such other and further relief as the Court may see fit.

JURY TRIAL IS DEMANDED ON ALL ISSUES SO TRIABLE HEREIN.

respectfully submitted,

Steven P. Bradbury

Steven P. Bradbury

Steven P. Bradbury

Pro Se

573 N Main Street

Unit 4

Barre, VT 05641

802.261.0004

abebrad69@gmail.com

Date: 22 April 2024

enclosed for filing my Complaint and Jury
Demand
Please send me two Summons with the
Docket Number stamped thereon
also send me a civil action cover sheet to fill
out and return it to you plus a form for me to
apply to waive advance payment of filing fees
and cost thank you
Steven Bradbury

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Steven P. Bradbury,

plaintiff,

v.

City of Montpelier, VT,

and its police department,

defendants.

COMPLAINT AND JURY DEMAND

1. This is Steven Bradbury's Complaint for damages and injunctive relief for defendants' systematic denial of his Constitutional rights causing him to lose his job, his car, and destroy his family and reputation.

JURISDICTION

2. Federal question under 42 U.S.C. §1983 and 18 U.S.C. §1962(c) ("R.I.C.O").

VENUE

3. Proper in this Court, not in Vermont, under principles of *forum non conveniens* (plaintiff cannot get a fair trial in Vermont).

FACTS COMMON TO ALL COUNTS.

4. Plaintiff is an individual who has been harmed by systematic deprivation of his rights by defendants causing plaintiff to lose his car, his job, his freedom, and his girlfriend because of defendants' actions to oppress and abuse him *because* he appeared defenseless and easy pickings to the Montpelier police when they falsely arrested him in 2020.

Case 2:24-cv-00599-gwc Document 1 Filed 05/15/24 Page 5 of 7

5. Mr Bradbury was arrested by Montpelier police near the Cumberland Farms after gassing up his car on his way to work in Barre Vermont.
6. Montpelier police illegally searched his car and then sought a warrant to cover up their illegal search.
7. The car was impounded. Mr Bradbury never got it back. Ever.
8. Later Mr Bradbury was arrested for allegedly stealing a laptop which he had borrowed. He languished in jail for nearly four months before finally pleading guilty for a sentence of time served *NOT* because he was guilty but in order to bring the matter to a conclusion and for no other reason.

COUNT ONE—42 U.S.C. §1983

9. Paragraphs one through eight are incorporated by reference.
10. Defendants' actions were state action depriving plaintiff of his Constitutional rights proximately causing damages in an amount to be proven at trial.

COUNT TWO (RICO)

11. Paragraphs one through ten are incorporated by reference.
12. Defendants' conduct of an enterprise through a pattern of racketeering caused Mr Bradbury damage to his business or property in an amount to be proven at trial.

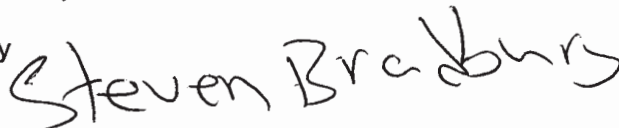
WHEREFORE, PLAINTIFF DEMANDS JUDGMENT

1. GRANTING INJUNCTIVE RELIEF both preliminary and permanent ORDERING defendants to cease abuse of his constitutional rights;
2. AWARDING damages in an amount to be proven at trial, trebled, plus attorney fees, interest, and costs;
- and
3. GRANTING such other and further relief as the Court may see fit.

JURY TRIAL IS DEMANDED ON ALL ISSUES SO TRIABLE HEREIN.

respectfully submitted,

Steven P. Bradbury

A handwritten signature in black ink that reads "Steven Bradbury". The signature is written in a cursive, slightly slanted style.

Steven P. Bradbury

Steven P. Bradbury

Pro Se

573 N Main Street

Unit 4

Barre, VT 05641

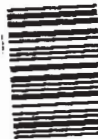
802.261.0004

abebrad69@gmail.com

Date: 22 April 2024

Steven Brubaker
573 N Main St
Barre VT 05641

FORM LETTER
BARRE, VT 05641
MAY 10, 2024



10007



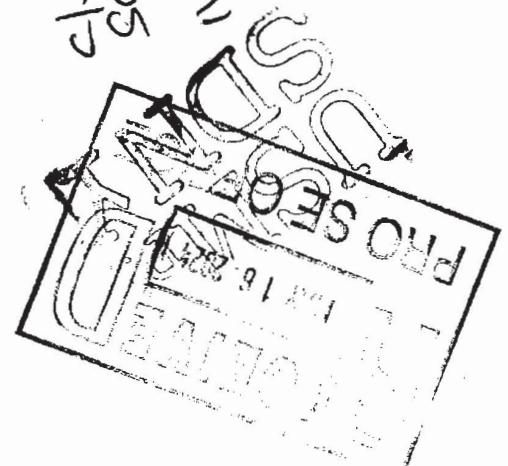
RDC 99

\$0.24

S2324A500455-8



clerk civil us District court
Southern District of New York
500 Pearl St.
New York NY 10007



Pro Se
10007\$1330

